THIS IS THE <u>BEGINNING</u> OF ADMINISTRATIVE FINE CASE # <u>3624</u>





2019 MAR 20 AM 9: 26

SENSITIVE

March 20, 2019

MEMORANDUM

TO:

The Commission

THROUGH:

Alec Palmer

Staff Director

FROM:

Patricia C. Orrock PCO

Chief Compliance Officer

Debbie Chacona DC Assistant Staff Director Reports Analysis Division

BY:

Kristin D. Roser/Ben Holly BH

Reports Analysis Division Compliance Branch

SUBJECT:

Reason To Believe Recommendation - 2018 30 Day Post-General Report

(Unauthorized Filers) for the Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file or timely file the 2018 30 Day Post-General Report in accordance with 52 U.S.C. § 30104(a). The list is comprised of unauthorized committees that failed to file or timely file the 2018 30 Day Post-General Report.

The committees appearing on the 30 Day Post-General Report list either failed to file the report, filed the report within thirty (30) days of the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with 11 C.F.R. § 111.43, these committees should be assessed the civil money penalties indicated in the attachment.

In order to determine the level of activity for unauthorized quarterly filers that failed to file or failed to timely file the 30 Day Post-General Report, the Reports Analysis Division (RAD) used the following procedures and criteria:

- Every 30 Day Post-General Report (30 Day Report) submitted by an unauthorized quarterly filer that covered the period from October 1, 2018 through November 26, 2018 (57 days), was reviewed for activity which would have required the filing of a 12 Day Pre-General Report (12 Day Report). If our research indicated that the filing of a 12 Day Report was required, we utilized a two-step method to arrive at the estimated level of activity on which to base the fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 12G. Second, if the committee had any unitemized activity, a per diem level of activity was used by multiplying the total amount of activity on the report by 29.82% (17 days (12G Filing Period))57 days (30G Filing Period)).
- The committees identified through this process as failing to file or failing to timely file the 12 Day Report were included in the Reason to Believe Recommendation circulated to the Commission on March 13, 2019. If the same committee also failed to file the 30 Day Report in a timely manner, we based the 30 Day Report fine on the amount of the remaining level of activity. We arrived at this amount by subtracting the estimated level of activity for the 12 Day Report from the total amount of activity on the 30 Day Report. In these cases, the committees will also be assessed a fine for the 30 Day Report based on the estimated levels of activity described above and are included on the attached list.
- Every Year-End Report (YE) submitted by an unauthorized quarterly filer that covered the period from October 1, 2018 through December 31, 2018 (92 days) was reviewed for activity which would have required the filing of a 30G. If our research indicated that a 30G was required, we utilized a three-step method to arrive at the activity on which to base the 30G fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 30G. Second, if the committee had any unitemized activity, a per diem level of this activity was calculated by multiplying the total amount of unitemized activity on the report by 61.96% (57 days (30G Filing Period)/92 days (YE Filing Period)). Third, we took the sum of the amounts calculated in steps one and two to arrive at the level of activity assigned to the 30G. If the same committee was required to file the 12 Day Report, but failed to file this report, we utilized a three-step method to arrive at the activity on which to base the 30G fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 30G. Second, if the committee had any unitemized activity, a per diem level of this activity was calculated by multiplying the total amount of unitemized activity on the report by 43.48% (40 days (30G Filing Period)/92 days (YE Filing Period)). Third, we took the sum of the amounts calculated in steps one and two to arrive at the level of activity assigned to the 30G.

Recommendation

- 1. Find reason to believe that the political committees and their treasurers, in their official capacity, listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
- 2. Send the appropriate letters.

Federal Election Commission Reason to Believe Circulation Report 2018 POST-GENERAL Not Election Sensitive 12/06/2018 UNAUTH

AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3622	C00492579	AMERI <u>CAN PRINCIPLES</u>	EYTAN LAOR	\$313,566	11	1/23/2019	48 (Not Filed*)	\$52,662	\$4,906
3624	C00658757	AMERICANS SUPPORTING VETERANS PAC	MARK SLY	\$576,156	0	12/23/2018	17	\$78,172	\$3,063

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Į	AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty	
	3644	C00157941	PEACE ACTION PAC/ FKA SANE/FREEZE PAC	ROSALIE GREENE	\$167,510	a	12/26/2018	20	\$76,996	\$3,501	
	3645	C00131706	PIPEFITTERS LOCAL UNION #524	PATRICK DOLAN	\$194,859	0		Not Filed	\$32,477 (est)	\$1,230	١

3665 C0052245	TOGETHER WE THRIVE	CHRISTOPHER ZULLO	\$133,515	0	Not Filed	\$19,074 (est)	\$684

^{*} The committee filed their report more than thirty (30) days after the due date; therefore, the report is considered not filed.

BEFORE THE FEDERAL ELECTION COMMISSION

in the Matter of)	
Reason To Believe Recommendation - 2018 30 Day Post-General Report (Unauthorized Filers) for the Administrative Fine Program:)	
AMERICAN PRINCIPLES, and LAOR, EYTAN as treasurer;)	AF# 3622
AMERICANS SUPPORTING VETERANS PAC, and SLY, MARK as treasurer;)	AF# 3624

PEACE ACTION PAC/ FKA

SANE/FREEZE PAC, and ROSALIE

GREENE as treasurer;

PIPEFITTERS LOCAL UNION #524, and

DOLAN, PATRICK as treasurer;

)

AF# 3644

)

AF# 3645

TOGETHER WE THRIVE, and) AF# 3655 CHRISTOPHER ZULLO as treasurer;

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission, do hereby certify that on March 21, 2019 the Commission took the following actions on the Reason To Believe Recommendation - 2018 30 Day Post-General Report (Unauthorized Filers) for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated March 20, 2019, on the following committees:

AF#3622 Decided by a vote of 4-0 to: (1) find reason to believe that AMERICAN PRINCIPLES, and LAOR, EYTAN in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3624 Decided by a vote of 4-0 to: (1) find reason to believe that AMERICANS SUPPORTING VETERANS PAC, and SLY, MARK in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3644 Decided by a vote of 4-0 to: (1) find reason to believe that PEACE ACTION PAC/ FKA SANE/FREEZE PAC, and ROSALIE GREENE in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3645 Decided by a vote of 4-0 to: (1) find reason to believe that PIPEFITTERS LOCAL UNION #524, and DOLAN, PATRICK in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3655 Decided by a vote of 4-0 to: (1) find reason to believe that TOGETHER WE THRIVE, and CHRISTOPHER ZULLO in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

Merch 21,2019

Date

Dayna C. Brown

Secretary and Clerk of the Commission



March 21, 2019

Mark Sly, in official capacity as Treasurer. Americans Supporting Veterans PAC 8100 Ft Smallwood Rd Baltimore, MD 21226

C00658757 AF#: 3624

Dear Mr. Sly:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 30 Day Post-General Report of Receipts and Disbursements in a calendar year in which a regularly scheduled general election is held. This report, covering the period October 1, 2018 through November 26, 2018 shall be filed no later than December 6, 2018. 52 U.S.C. § 30104(a). Records at the Federal Election Commission ("FEC") indicate that this report was filed on December 23, 2018, 17 days late.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109g(a)(4). On March 21, 2019, the FEC found that there is reason to believe ("RTB") that Americans Supporting Veterans PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before December 6, 2018. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$3,063. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See https://www.fec.gov/af/pay.shtml 11 CFR § 111.34. Your payment of \$3,063 is due within forty (40) days of the finding, or by April 30, 2019, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive

Level of Activity: \$78,172 Number of Days Late: 17

Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review, 1050 First

Street, NE, Washington, DC 20002. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or April 30, 2019. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control, 11 CFR & 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. Id. Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Americans Supporting Veterans PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 et seq. The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, follow the payment instructions on page 4 of this letter. Upon receipt of your payment, the FEC will send you a final determination letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at https://www.fec.gov/af/pay.shtml If you have questions regarding the payment of the calculated civil money penalty, please contact Ben Holly in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1158) or (202) 694-1158.

On behalf of the Commission,

Eller L. Weintraul

Ellen L. Weintraub

Chair

ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$3,063 for the 2018 Post-General Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission P.O. Box 979058 St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox FEC #979058 1005 Convention Plaza Attn: Government Lockbox, SL-MO-C2GL St. Louis, MO 63101

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Americans Supporting Veterans PAC

FEC ID#: C00658757

AF#: 3624

PAYMENT DUE DATE: April 30, 2019

PAYMENT AMOUNT DUE: \$3,063

Americans Supporting Veterans PAC Honoring Our Veterans through Action

April 22, 2019

Office of Administrative Review Feral Election Commission 1050 First Street, NE Washington, DC 20463

RE: Americans Supporting Veterans Notice C00658757 - AF#: 3624 and AF#3665

To Whom it may concern;

I am writing to request an abatement of penalties in the amount of \$3,063 (Notice C00658757 -AF#: 3624) and \$6,541 (Notice C00658757 - AF#3665) as assessed in the enclosed notice that is dated April 8 2019.

The reports that were not properly filed are Year-End Report of Receipts and Disbursements for the 2018 calendar year and 30 Day Post-General Report of Receipts and Dishursements for the period covering October 1, 2018- November 26, 2018. The reason that these reports were not properly filed in time was due to our lack of inexperience in this business structure. We were unaware that we needed assistance from an outside vendor. In an immediate effort to rectify this situation and ensure proper management for all future reporting we have retained a PAC treasury service that will be guiding us moving forward (MorganMeredith.com).

aread the heat tup if heighed, i to Please accept my petition for abatement of penalties owed for reasonable cause. If you have any questions or need any additional information, you can reach me at info@americanssupportingvets.org. We sent a payment that covers the penalties we owe for AF#3624 in the amount of \$3063 today.

Sincerely,

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Americans Supporting Veterans PAC

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CC: Federal Election Commission MINABLE BOTOM STUDIE PRINCIPLES OF THE PARK SERVICE CONTROL

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www.americansupportingvets.org

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May 23, 2019

REVIEWING OFFICER RECOMMENDATION OFFICE OF ADMINISTRATIVE REVIEW ("OAR")

AF# 3624 and AF# 3665 – Americans Supporting Veterans PAC and Mark Sly, in his official capacity as Treasurer (C00658757)

Summary of Recommendation

Make a final determination in AF# 3624 that the respondents violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$3,063.

Make a final determination in AF# 3665 that the respondents violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$6,541.

Reason-to-Believe Background

The 2018 Post-General Report was due on December 6, 2018. The respondents filed the report on December 23, 2018, 17 days late. The report is not election sensitive and was filed within 30 days of the due date; therefore, the report is considered late. 11 C.F.R. §§ 111.43(d)(1) and (e)(1).

On March 21, 2019, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 Post-General Report and made a preliminary determination that the civil money penalty was \$3,063 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter was mailed to the respondents' address of record from the Reports Analysis Division ("RAD") on March 21, 2019 to notify them of the Commission's RTB finding and civil money penalty.

The 2018 Year-End Report was due on January 31, 2019. The respondents filed the report on March 29, 2019, 57 days late. The report is not election sensitive and was not filed within 30 days of the due date; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(1).

On April 5, 2019, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 Year-End Report and made a preliminary determination that the civil money penalty was \$6,541 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter was mailed to the respondents' address of record from

the Reports Analysis Division ("RAD") on April 8, 2019 to notify them of the Commission's RTB finding and civil money penalty.

Legal Requirements

The Federal Election Campaign Act ("Act") states that the treasurer of a committee not authorized by a candidate shall file a post-general report covering through the 20th day after the election no later than 30 days after the election. The committee shall also file a report for the quarter ending December 31 no later than January 31 of the following calendar year. 52 U.S.C. § 30104(a) and 11 C.F.R. § 104.5(c)(1). Reports electronically filed must be received and validated at or before 11:59 pm Eastern Standard/Daylight Time on the filing deadline to be timely filed. 11 C.F.R. §§ 100.19(c) and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

Summary of Respondents' Challenge

On April 29, 2019, the Commission received the written response ("challenge") from the respondents requesting abatement of both penalties. The Committee states the reports were not timely filed due to their "...inexperience in this business structure." To remedy their situation and ensure proper reporting in the future, they have retained a consultant.

Analysis

Commission records indicate the Committee was notified of their 2018 Post-General reporting requirement on multiple occasions prior to the filing deadline. On November 8, 2018, the Commission's Information Division sent the 2018 General Election Prior Notice to mark@mojo.biz, the email address listed on the Committee's Statement of Organization. The notice included the filing schedule for the remainder of 2018, including the 2018 Post-General and Year-End Report. On December 2, 2018, the Commission's Electronic Filing Office ("EFO") sent a reminder email regarding the 2018 Post-General Report to mark@mojo.biz and afakeri@mojo.biz. On December 7, 2018, the day following the filing deadline, EFO sent a late notification email to the same email addresses because the report had not yet been filed. On December 20, 2018, RAD sent the non-filer notification via email to mark@mojo.biz.

Commission records also indicate the Committee was notified of their 2018 Year-End reporting requirement on multiple occasions prior to the filing deadline. On December 21, 2018, the Commission's Information Division sent the 2018 Year-End Report Prior Notice to mark@mojo.biz, the email address listed on the Committee's Statement of Organization. On January 28, 2019, EFO sent a reminder email regarding the 2018 Year-End Report to mark@mojo.biz and afakeri@mojo.biz. On February 1, 2019, the day following the filing deadline, EFO sent a late notification email to the same email addresses because the report had not yet been filed. On February 19, 2019, RAD sent the non-filer notification via email to mark@mojo.biz.

Based on these notifications, the respondents should have been aware of the 2018 Post-General and Year-End filing requirements. Further, failure to know filing dates and inexperience of a Treasurer or committee staff are included at 11 C.F.R. § 111.35(d) as examples of a circumstance that will not be considered reasonably unforeseen and beyond the respondents' control. Therefore, the Reviewing Officer recommends that the Commission make a final determination in AF# 3624 and AF# 3665 that the respondents violated 52 U.S.C. § 30104(a) and assess civil money penalties of \$3,063 in AF# 3624 and \$6,541 in AF# 3665.

OAR Recommendations

- 1. Adopt the Reviewing Officer recommendation for AF# 3624 involving Americans Supporting Veterans PAC and Mark Sly, in his official capacity as Treasurer, in making the final determination;
- 2. Make a final determination in AF# 3624 that Americans Supporting Veterans PAC and Mark Sly, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$3,063 civil money penalty;
- 3. Adopt the Reviewing Officer recommendation for AF# 3665 involving Americans Supporting Veterans PAC and Mark Sly, in his official capacity as Treasurer, in making the final determination:
- 4. Make a final determination in AF# 3665 that Americans Supporting Veterans PAC and Mark Sly, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$6,541 civil money penalty; and
- 5. Send the appropriate letter.

Attachments

- Attachment 1 -
- Attachment 2 -
- Attachment 3 -
- Attachment 4 Declaration from RAD
- Attachment 5 Declaration from OAR

DECLARATION OF KRISTIN D. ROSER

- I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission
 ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the
 Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a
 witness, could and would testify competently to the following matters.
- It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter
 they receive or any questions relating to the FECFile software or administrative fine regulations, including due
 dates of reports and filing requirements.
- 3. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Americans Supporting Veterans PAC:
 - A) Non-Filer Letter, dated December 20, 2018, referencing the 2018 30 Day Post-General Report (sent via electronic mail to: mark@mojo.biz);
 - B) Non-Filer Letter, dated February 19, 2019, referencing the 2018 Year-End Report (sent via electronic mail to: mark@mojo.biz);
 - C) Reason-to-Believe Letter, dated March 21, 2019, referencing the 2018 30 Day Post-General Report (sent via overnight mail to the address of record);
 - D) Reason-to-Believe Letter, dated April 8, 2019, referencing the 2018 Year-End Report (sent via overnight mail to the address of record).
- 4. I hereby certify that I have searched the Commission's public records and find that Americans Supporting Veterans PAC filed the 2018 30 Day Post-General Report with the Commission on December 23, 2018, and the 2018 Year-End Report with the Commission on March 29, 2019.
- Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 10th day of May, 2019.

Ben Holl for KDR

Kristin D. Roser
Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission



RQ-7

December 20, 2018

SLY, MARK, TREASURER AMERICANS SUPPORTING VETERANS PAC 8100 FT SMALLWOOD RD BALTIMORE, MD 21226

IDENTIFICATION NUMBER: C00658757

REFERENCE: POST-GENERAL REPORT (10/01/2018 - 11/26/2018)

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended. 52 U.S.C. §30104(a)

It is important that you file this report immediately with the Federal Election Commission, 1050 First Street, NE, Washington, DC 20002. Please note that <u>electronic filers must submit their reports electronically</u>, as per 11 CFR §104.18. A copy of the report or relevant portions must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.fec.gov.

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

If you have any questions regarding this matter, please contact Aimee Wechsler in the Reports Analysis Division on our toll-free number (800)424-9530. The analyst's direct number is (202)694-1194.

AMERICANS SUPPORTING VETERANS PAC

Page 2 of 2

Sincerely,

Debbie Chacona

Deborah Chacona Assistant Staff Director Reports Analysis Division

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DECLARATION OF RHIANNON MAGRUDER

- 1) I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) A committee not authorized by a candidate shall file a post-general report covering through the 20th day after the election no later than 30 days after the election. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on December 6, 2018 for the 2018 Post-General Report to be timely filed.
- 3) A committee not authorized by a candidate shall file a report covering through December 31 no later than January 31 of the following calendar year. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on January 31, 2019 for the 2018 Year-End Report to be timely filed.
- 4) I hereby certify that I have searched the Commission's public records and that the documents identified herein are the true and accurate copies of:
 - a) Cover Page, Summary Page, and Detailed Summary Pages of the 2018 Post-General Report filed by Americans Supporting Veterans PAC and Mark Sly, in his official capacity as Treasurer, and received on December 23, 2018.
 - b) Cover Page, Summary Page, and Detailed Summary Pages of the 2018 Year-End Report filed by Americans Supporting Veterans PAC and Mark Sly, in his official capacity as Treasurer, and received on March 29, 2019.
- 5) Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington, D.C. on the 23rd day of May, 2019.

Rhiannon Magruder
Reviewing Officer

Office of Administrative Review Federal Election Commission

Image# 201812239143662951

FEC

REPORT OF RECEIPTS **AND DISBURSEMENTS**

PAGE 1/9

FORM 3X	For	Other Tha	n An Author	ized Commi	ttee		Office Use	e Only	
1. NAME OF COMMITTEE (in f		E OR PRINT	▼	Example: If ty over the lines		12FE4N		ë S	
Americans Sup	porting Ve	terans PA	AC .						1
	<u>.iii</u>				1 		<u> </u>		
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ADDRESS (number and		100 Ft Smallw	ood Rod		سند				لبب
▼ Check if diffe	ron. L	· 				-11			
Check if different than previous reported. (AC	ly . s	Baltimore			1	I MD I	21226	. -	1
	~/ <u></u>				,],		_		
2. FEC IDENTIFICA	ATION NUMB	ER ▼	CITY	<u> </u>		STATE A		ZIP CODE	: A
C C00658757	,	Control of the Contro	3. IS TI REP		NEW (N) OR	, ,	MENDED A)		
4. TYPE OF REP (Chaose One)	ORT ((b) Monthly Report	Feb 20	(M2)	May 20 (M5	See A	g 20 (M8)		lov 20 (M11) ton-Election ear Only)
(a) Quarterly Rep	orts:	Due On:	Mar 20	(M3)	Jun 20 (M6	5458 2002	p 20 (M9)		Dec 20 (M12) Non-Election Bar Only)
April 15 Quarterly		<u> </u>	Apr 20	(M4)	Jul 20 (M7)	6-AI	t 20 (M10)	7-76	an 31 (YE)
Quarterly July 15 Quarterly	Report (Q1)	(c) 12-D	ay 🥻	Primary (1	2P)	Genera	l (12G)) A	unoff (12R)
•	Report (Q2)	1	ort for the:	Conventio	n (12C)	Special	(12S)		
Quarterly	Report (Q3)			3 M 12 M 13	1 000001	\$\$\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	¥"-}	in the	
	31 Report (YE)		Election o	n 🐫		Secretaria de la compania del compania del compania de la compania del la compania de la compani		State of	
July 31 M Report (I Year Onl	Non-election	l .	. *	General (30G)	Runoff	(30R)	S	pecial (30S)
Terminati (TER)	on Report		Election o		06	2019	¥ 'S	in the State of	
5. Covering Period	10	01	2018	throug		26	201		
I certify that I have ex	amined this R	eport and to	the best of my	knowledge ar	d belief it is	true, correct a	ind complet	e.	
Type or Print Name of	\$	Sly, Mark, , ,				•			
Signature of Treasurer	Sly, Mark,			[Electronic	cally Filedj	Date 12	M / D 23	D Y	2018
NOTE: Submission of fa	alse, erroneous	, or incomple	te information m	nay subject the	person signing	this Report to	the penaltie	s of 52 U	.S.C. § 3010
Office Use								FORN ev. 05/201	

SUMMARY PAGE

		FEC Form 3X (Rev. 05/2016)	OF RECEIPTS AND DISBURSEMENTS	Page 2
W	rite d	or Type Committee Name	**	
_	\me	ericans Supporting Veterans P	AC .	
R	eport		10 01 2018 T	o: 11 26 2018
	•		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6.	(a)	Cash on Hand January 1, 2018		19072.99
	(b)	Cash on Hand at Beginning of Reporting Period	19211.61	
	(c)	Total Receipts (from Line 19)	57239.00	228825.00
	(d)	Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	76450.61	247897.99
7.	Tota	al Disbursements (from Line 31)	20933.81	192381.19
8.	Rej	sh on Hand at Close of porting Period btract Line 7 from Line 6(d))	55516.80	55518.80
9.	the	ots and Obligations Owed TO Committee (Itemize all on nedule C and/or Schedule D)	0.00	
10.	the	ots and Obligations Owed BY Committee (Itemize all on nedule C and/or Schedule D)	O.OO Francisco Military of a material of the military and the materials and the military of the mi	
Samuel.	Second Second	This committee has qualified as a multic	eandidate committee. (see FEC FORM 1M)	
	_		For further information contact:	
			Federal Election Commission 999 E Street, NW Washington, DC 20463	
			Toll Free 800-424-9530 Local 202-694-1100	

(subtract Line 18(c) from Line 19)▶

	DETAILED SUIVINARY PAGE	
FEC Form 3X (Rev. 05/2016)	of Receipts	Page 3
Write or Type Committee Name		
Americans Supporting Veterans	PAC	
Report Covering the Period: From:	10 01 2018 T	o: 11 26 2018
Treport Covering the Foliate.	nang at timung mili dan pang dan kanan pang dan panggan panggan panggan panggan panggan panggan panggan pangga Tanggan panggan pangga	The state of the s
I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other		
Than Political Committees	I see the considerer and become the constitution of the constitution of the considerer and constitution of	has a sind to make has a sind material for each of season design of the material and a single of a single
(i) Itemized (use Schedule A)	0.00	1100.00
	free three demonstration of the special grant free free free free free free free fre	die een die versche van die verschie van die verschie van die verschie die die die verschie van die verschie v Zoor die geven die geven van geven van die verschie van die verschie van die verschie van die verschie van die
(ii) Unitemized	57239.00	227725.00
(iii) TOTAL (add	in a militar and a confidence of the confidence	has not been discould the wither a situatellier of the continue will transfer on growing many transfer imposes by many a strip in a growing more and a situate of the continue of the continu
Lines 11(a)(i) and (ii)	57239.00	228825.00
	have respect to the state of the continuence of the	kan parakan mendisan di dalam mengan di mendili dan pertama di mendili dan pertama pertama pertama pertama per Pertama penama pena
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees	" - Lange of the control of the cont	la manda en se de sem el la demanda en el carrolla la la carrolla constitució del la carrolla con- la carrolla en especial en la carrolla en el carro La carrolla en el ca
(such as PACs)	0.00	0.00
(d) Total Contributions (add Lines	* Survey to a contract of Special Law and Survey Statement for an absence Statement and survey to	En eard an ag the partition and have a strong of the another and a partition and the con-
11(a)(iii), (b), and (c)) (Carry	To see the second s	Emerical and a second s
Totals to Line 33, page 5)	57239.00	228825.00
12. Transfers From Affiliated/Other	de mensel fram en de men de districa de la mental mensel de la media men del perse del desse del mensel de la La mental de la men	k mengelang pelangan Planenselan seri-kang Planenselangan litera di Planenselan seri pantang menengan mengenarang pelantaga mengapatan penatrangan mengapatan
Party Committees	0.00	0.00
	" - Committee grade a set time and a results are of the result are maintained black at the case of grade agreement and the contract of the case of th	lang a dia pandang dilang dilang dia pandang dia pantikan dilang dia pandang dilang dilang dilang di Samang pandang pangganang ng managaman agaman ganan ng pandang sa pandang dia pandang
13. All Loans Received	1 000 1	0.00
70, 71 Louis Hooston	las amblemen filmen et til flegge på mer en flesse skallelanna til amse til amblet til til til en et til en på	Kuray Haganda gaid tagantan nodemoldiga a dinang dipunatibang ganer
	0.00	0.00
14. Loan Repayments Received		kan sa dha ann dhean dhe
15. Offsets To Operating Expenditures		
(Refunds, Rebates, etc.)	0.00	U UU
(Carry Totals to Line 37, page 5)	U.OU	0.00 Committee and the confliction of the conflicti
16. Refunds of Contributions Made		
to Federal Candidates and Other	Secretary and the second secretary of the second secretary and second second second second second second second	grande mysteriolyte metrification filter telegraphic filter from the filter telegraphic telegraphic telegraphic
Political Committees	3 0.00 § Santa and a	0.00
17. Other Federal Receipts	Em redengalde nordeng uten der producer de monde mante, ang damagat na egit	kritises til en similitare melli sammeli mang sebang selatan meliti mendikan melatan se se sa
(Dividends, Interest, etc.)		0.00 has all and the control of the
18. Transfers from Non-Federal and Levin Fu	inas	
(a) Non-Federal Account	Stranding and have a firm of the strange and a section of the strange of the stra	in the state of the confine of the c
(from Schedule H3)	0.00	0.00 In a continuação, con Milascola consederant Milascola, com termente la come
	Emmers by the reference of management of a consideration of a consideration of a consideration of	Enclosed the continuous of the
(b) Levin Funds (from Schedule H5)	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	0.00
	The control of the co	har professional considerancian para subject and security in the properties of the con- continues and an expension of the continues of the con
(c) Total Transfers (add 18(a) and 18(b))	0.00	0.00
19. Total Receipts (add Lines 11(d),	landen er lande kalansa dan selam dan arkan er lande er lande er landen er lande er lande er lande er lande er	han kambanakanakan han kambanin an masir.
12, 13, 14, 15, 16, 17, and 18(c))	57239.00	228825.00
	Bearith and the Charles of an older Chinas from the continue to and	Francisco de la colonia de Colonia
20. Total Federal Receipts	the providence of the plane of the providence of	kananistanisti maka maka mika mekana kana kata salah sa kana kana sal

57239.00

228825.00

DETAILED SUMMARY PAGE

of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 4

II. Disbursements			COLUMN A	COLUMN B		
. (Ope	rating Expenditures:	Total This Period	Calendar Year-to-Date		
	(a)	Allocated Federal/Non-Federal				
		Activity (from Schedule H4)	0.00	0.00		
		(i) Federal Share	has dimadhantilla ar la coitean floireacha graine a la coilean d	tion of the state		
			to the state of the second state of the second seco			
		(ii) Non-Federal Share	0.00			
1	(b)	Other Federal Operating	hanakun kunthi adhir ada sa kamalikan kunthi adhir adhir Yanan kunthi adhir a	Transactions also will be a libraried and transaction will be a secured as a libraried and a secure of the security of the sec		
		Expenditures	20933.81	192381.19		
	(C)	Total Operating Expenditures	hanata jarah melikin dikamata meliki salamata hilika salamata salah salah salah salah salah salah salah salah garam pembagai salah	An english medinggi Africa pilonggi mendikan mililah melang sebilan se		
	• •	(add 21(a)(i), (a)(ii), and (b))	20933.81	192381.19		
	Tran	sfers to Affiliated/Other Party	han saltan militari di kamatan matan di kina atau da kamatan di kamatan di kamatan di kamatan di kamatan di ka gamatan matan da kamatan di kamat	 Superior and an information and the engineering and allowing the superior and an information of the property of the engineering and an information of the engineering and a		
		mittees	0.00	0.00		
3.	Con	tributions to	han dan di salik pada pada salik da di kanda kandi kandi kandi kandi kandi.	han a kan na kan na kitan a kan na kan n na na n		
	Fed	eral Candidates/Committees Other Political Committees	0.00	0.00		
			According to the confliction attended to the confliction of the confli	Control of the self to the self of the self control of the self to		
		pendent Expenditures Schedule E)	0.00	0.00		
5.	Coo	rdinated Party Expenditures	and so the state of the state o	A section of the Standard and and and are the section of the secti		
	(52	U.S.C. & 30116(d))		. Sa na materia ng kao malipina ng kaon ng kao mga mandan n- alian na mana a la Tao mandang ng kaon malipina na kaon ng kao mga		
	(use	Schedule F)	0.00 j	0.00 Landing day (Kanadaya tang Kanadaya day at Kanada		
			The state of the s	The state of the s		
5 .	Loa	n Repayments Made	0.00	0.00		
			de amentinament kan mentikan mendelam mentikan mentikan mentikan mentikan mentikan mentikan mentikan mendelam Separat mengenan men	- I wanting the attractional continued be colored in the with good grant processing and processing and processing and pro-		
7.	Loa	ns Made	0.00	0.00		
3.	Refu	unds of Contributions_To:	Frencher also Allend Marie Amerikaansk on Mitter Amerikaansk om Marie More als genoem general para ag para ang marie an ag amang marie para ang marie an ang marie an	La colonia de la gildo contracente en Arquintera activo en Atrica. Giornales en arquintes a granda granda florida que en activo en aquinte en activo en activo en activo.		
	(a)	Individuals/Persons Other Than Political Committees	0.00	0.00		
			The control of the co	- Karantharandarand Lancatharanthara Marantharantharantharantharanth		
	/h)	Political Party Committees		0.00		
		Other Political Committees	0.00 more distributive adaptive distributive	Annual la marita de la fina de la companya de la co		
	(6)		3			
		(such as PACs)	0.00	0.00 colors of the colors of t		
	(d)	Total Contribution Refunds	The transfer control of the control of the state of the state of the state of the control of the properties of the state o	Between the special properties of market properties and the special properties of the special special special s		
		(add Lines 28(a), (b), and (c))	0.00	0.00		
			hamilian alkarilde adhamilian dha dha ahaaldhadhaa f	- Egyandamadha a Llegandharadh ann 1916 an dear a lleachd leag le		
3.	Oth	er Disbursements (Including	And the state of the	the sound of the conflict money because the conflict of the co		
		n-Federal Donations)	0.00	0.00		
			Samuel and the said of the street of the said of the s	han and mountain a little and on a flower When the constitution of the		
).	Fed	leral Election Activity (52 U.S.C. § 30101)	20))			
		Allocated Federal Election Activity	•			
	(,	(from Schedule H6)				
		(i) Federal Share	To the state of the second sec	de ou		
		(1) I decide chare	0.00)	0.00 		
		(ii) III aviall Chara	Andrew a tiller og meller former flynn gantler fransif er om elleger som til menne flynn om elleger om elleger	i di kanan kanan di k Bisan di kanan kanan di kanan		
		(ii) "Levin" Share	0.00	0.00		
	(b)	Federal Election Activity Paid	Taman den amiliara mediamendik menelapa salah seriah semilaran dan menelapa pelaman di Jaman sebagai seperatu penelapa seriah mengan mengan menenan generas seriah seriah seriah seriah seriah seriah	. Bet van Standards in einsternen internen der mande in med han eine krief in verschitzen in der gemen verschiede im die 1998 gesteret der kriefen der stande in 1992 er verschiede in verschiede in der versch		
		Entirely With Federal Funds	0.00	0.00		
	(c)	Total Federal Election Activity (add	ત્રિક સ્ટાપ્ટરિક કરાવિકા અને નિર્દેશ અને કેવા અને કેવા અને ત્રિક અને ત્રિક અને કેવા સ્ટાર્ટિક અને કેવા અને કે - કુકારા અને કુકાર કર્યું કરાવા મહું સામાના કુકાર અને કુકાર અને કહ્યાં કરવા કરવા છે. અને કુકાર કર્યા માટે અને			
		Lines 30(a)(i), 30(a)(ii) and 30(b))	0.00	0.00		
		· · · · · · · · · · · · · · · · · · ·	The same of the sa	English of the will be with the state of the state of the will be with		
	Tota	al Disbursements (add Lines 21(c), 22,				
٠.		• • • •	the state of the safes and as standard and an it is a facilities of the safe			
	2 3,	24, 25, 26, 27, 28(d), 29 and 30(c))	20933.81	192381.19		
,	T-4-	ol Endoral Diahumanana	in a superior de la company de la compan La company de la company d	eminent or and an experience of many and an employed of the first garden employed of place of the particle of		
		al Federal Disbursements				
		https://page/14/10/10/10/10/10/10/10/10/10/10/10/10/10/				
		btract Line 21(a)(ii) and Line 30(a)(ii) n Line 31)	Bearing the configuration of	- Bereit alleger of the explorer advantage and the properties of the contract		

DETAILED SUMMARY PAGE

•	FEC Form 3X (Rev. 05/2016)	of Disbursements	Page 5
	III. Net Contributions/ Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
	Total Contributions (other than loans) (from Line 11(d), page 3)	57239.00	228825.00
	Total Contribution Refunds (from Line 28(d))	0.00	0.00
	Net Contributions (other than loans) (subtract Line 34 from Line 33)	57239.00	228825.00
	Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))	20933.81	192381.19
	Offsets to Operating Expenditures (from Line 15, page 3)	0.00	0.00
38.	Net Operating Expenditures (subtract Line 37 from Line 36)	20933.81	192381.19

PAGE 1 / 10

FEC

REPORT OF RECEIPTS AND DISBURSEMENTS

FORM 3X	or Other Than	An Authorized	Committee			Office Use Only	
1. NAME OF COMMITTEE (in full)	TYPE OR PRINT		mple: If typing r the lines.	, type	12FE4M5		
Americans Supporting	Veterans PA	C	11111	114-	<u> </u>		لـــــا
1		11111	11111				
ADDRESS (number and street)	8100 Ft Smallwo	ood Rod	1111				لىب
Check if different than previously reported. (ACC)	Baltimore				MD	21226	لبيبا
2. FEC IDENTIFICATION NU	MBER ▼	CITY ▲		S	STATE A	ZIP COL	DE ▲
C 000658757	4	3. IS THIS REPORT	K NE	W OR	AMI	ENDED	
4. TYPE OF REPORT (Choose One)	(b) Monthly Report Due On:	Feb 20 (M2)	i nejš ganta	ay 20 (M5)	المجا	20 (M8)	Nov 20 (M11) (Non-Election Year Only)
(a) Quarterly Reports:		Mar 20 (M3)	T);	n 20 (M6)	9.428 3399	20 (M9)	Dec 20 (M12) (Non-Election Year Only)
April 15 Quarterly Report (Q	1)	Apr 20 (M4)	Ju	1 20 (M7)	Rock	0 (M10)	Jan 31 (YE)
July 15 Quarterly Report (Q	(c) 12-Da PRE-	ty Election rt for the:	Primary (12P) Convention (12)	2C)		7-48	Runoff (12R)
October 15 Quarterly Report (Q		4 }			^		· catch adapting
January 31 Year-End Report (Y	E)	Election on	MM	Sales Sales		State of	de constituir de la con
July 31 Mid-Year Report (Non-election Year Only) (MY)	POST	ry r-Election	General (30G)	**************************************	Runoff (30	OR)	Special (30S)
Termination Report (TER)	, nepo	Election on	W W 7	0 0 1		in the State of	guerra de seguir de la companya de l
5. Covering Period 11	M 27 27	2018	through	и и 12	31	2018	
I certify that I have examined th		the best of my kno	wledge and be	elief it is tru	e, correct and	complete.	
Type or Print Name of Treasure	Sly, Mark, , ,						
Signature of Treasurer	Aark, , .		[Electronically)	<i>Filed)</i> D	ate 01	01 O1	2019
NOTE: Submission of false, errone	eous, or incomplet	e information may s	ubject the perso	on signing th	is Report to th	e penalties of 52	U.S.C. § 30109
Office Use Only						FEC FOR Rev. 05/20	

SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS Page 2 FEC Form 3X (Rev. 05/2016) Write or Type Committee Name Americans Supporting Veterans PAC 1 (D D 11 To: Report Covering the Period: From: **COLUMN A COLUMN B** This Period Calendar Year-to-Date (a) Cash on Hand 19072.99 January 1, (b) Cash on Hand at 55516.80 Beginning of Reporting Period..... 52607.00 Total Receipts (from Line 19) (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 300504.99 108123.80 6(a) and 6(c) for Column B)..... 67002.00 259383.19 7. Total Disbursements (from Line 31)......... Cash on Hand at Close of Reporting Period 41121.80 (subtract Line 7 from Line 6(d))..... 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) This committee has qualified as a multicandidate committee. (see FEC FORM 1M) For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530

Local 202-694-1100

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 05/2016)

Page 3

Write or Type Committee Name Americans Supporting Veterans Page 1	AC	
Report Covering the Period: From:	11 27 2018 To:	12 31 2018
I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
. Contributions (other than loans) From:		
(a) Individuals/Persons Other		_
Than Political Committees	he profession and a second	- Berger Berger Berger and Francis Character Street in the second to a contract in the second
(i) Itemized (use Schedule A)	100,00	1200.00
,	fa til striken senten en flekte stokkerste fra stokkerse fra en flekte stokkerse flekte stokker stok I stokkerse stokkerse stokkerse flekte stokkerse fra en en flekte stokkerse stokkerse stokkerse stokkerse stok	. In proceedings of the conflict and the conflict and separate of the conflict and separate of the conflict and the conflict
(ii) Unitemized	52507.00	280232.00
(iii) TOTAL (add	in mending medican di Arian Sama Sama Sama Sama Sama Sama Sama Sa	The continue of the continue o
Lines 11(a)(i) and (ii)	52607.00	281432.00
	kanantina adi terdita di terdita Salah separa di terdita di terdit	- Francische werde vorriffelte wild som die som die bestellt de de die verschiert verligt de verschie. Die verschiert verschiert was gewone gegen der zu de verschiert verschiert verschiert verschiert verschiert ver
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees	Parametric partition in The continue collection of the continue of the continu	. The profit of the second formation and the profit of the second to the second to the second the s
(such as PACs)	0.00	0.00
	k-n og legenerikt samillet meg iken er ekker seller er til ble med kreve ekker er blekktiver er blev en eft	Constitution of the state of th
	والمستران والمراجع والمناف والمناف المراجع والمستران والمنافع والمنافع والمستران والمستران والمستران والمنافع و	i ka manafanasa nakaratan kikamanaka na akarata na akarata na akarata na akarata na akarata na akarata na akar
11(a)(iii), (b), and (c)) (Carry	52607.00	281432.00
Totals to Line 33, page 5)	have also greaters of New weeks and his well-from the court by greaters and	In a strong to settle mile and produced from I was to settle of
. Transfers From Affiliated/Other	the second secon	P. 00
Party Committees	g 0.00 f	0.00 have been been been been been been been be
484 B I	4 ?	- Bergelikan perdikan merikan melana melan melan perdikan merikan menjan menjan menjan menjan menjan menjan me
. All Loans Received	0.00 f	
	ign consequencia con melo a mentra condescribir con de asser de conventir con esta mentral actual de	The anthonormal provide and second sometimes of an articles and
. Loan Repayments Received	0.00	0.00
. Offsets To Operating Expenditures	To a collection of the conflict of the collection of the confliction of the collection of the collecti	To a committed of the state of
(Refunds, Rebates, etc.)	besome the constitution of the confirmation of the confirmation of the confirmation of the confirmation of the	- Grant Confession Commission Confession Con
(Carry Totals to Line 37, page 5)	0.00	0.00
. Refunds of Contributions Made	kanan Paraga Kanasi Prinsip Maraga Kanan Kanan Hara - Bara - Bara - Baran Kanan Kanan Kanan Kanan Kanan Kanan Kanan Paraga Kanan K	Annual Committee of Committee o
to Federal Candidates and Other	ling in the same in a second manager and a second second second second second because it is second	galatik egiptement jarah sagah mangapan mengan mengan terbagai ana agam mangapan sa
Political Committees	0.00	0.00
. Other Federal Receipts	den mende samelle mende Et samele men her siche die samb den mehre med her sich des sich gesemble. Et samele seriegen den sich series men genera sich men den sich men segen men segen men segen men segen men ge	Tangadhan aithe aid tha a dhean aith a still punata ann a' an tEiread gailleagan agus agus ag a an garaig an agus an agus an agus an agus an agus an a
(Dividends, Interest, etc.)	0.00	0.00
. Transfers from Non-Federal and Levin Fund	in the contract of the contrac	To make a substance of the contract of the con
(a) Non-Federal Account	Property framewith and ordered the former of the control of the co	- James planter de la completa de l La completa de la co
(from Schedule H3)	0.00	0.00
,,,	te anakan melang til kemadapan ellap melikin melikan dipantiplikan dibiling tidan selik	harmadamis demost ditamenthem of propi limited harmada politica and
(h) Lavin Funda (from Cabadula 115)	0.00	0.00
(b) Levin Funds (from Schedule H5)	handan Argallin allandin Handan Libert I	O.OO Taran Taran San San San San San San San San San S
(a) Tatal Transfers (add 40(a) and 40(b))	the state of the s	. The same throughous respective and between the control of the co
(c) Total Transfers (add 18(a) and 18(b))	0.00 j	0.00
. Total Receipts (add Lines 11(d),	to an interest and a second of the second	i kangan kan
12, 13, 14, 15, 16, 17, and 18(c))	52607.00	281432.00
	and and to the influence is not thing to make withing in and	Burney and any all the artist and the second and th
. Total Federal Receipts	Secretaria de la composição de como como de co	The design of the telegraph of the second
(subtract Line 18(c) from Line 19)	52607.00	281432.00
· · · · · · · · · · · · · · · · · · ·	har and among an oil translation of parallely and the same	the continuous contraction of the contraction of the contraction of

from Line 31).....

DETAILED SUMMARY PAGE

of Disbursements

FEC Form 3X (Rev. 05/2016) Page 4 COLUMN A COLUMN B II. Disbursements **Total This Period** Calendar Year-to-Date 21. Operating Expenditures: (a) Allocated Federal/Non-Federal Activity (from Schedule H4) 0.00 0.00 (i) Federal Share 0.00 0.00 (ii) Non-Federal Share..... (b) Other Federal Operating 67002.00 259383.19 Expenditures (c) Total Operating Expenditures 67002.00 259383.19 22. Transfers to Affiliated/Other Party Committees..... Contributions to 23. Federal Candidates/Committees 0.00 and Other Political Committees. 24. Independent Expenditures 0.00 25. Anan Arech Const. nosillikeesi promposes 0.00 "anged on it to and read on it to return a the collection 26. Loan Repayments Made..... 0.00 0.00 .E.3A فاستراقاتك 0.00 0.00 Anneil konskumentinast lämetämiselien Alianniks 0.00 dharritani I karikara Kamal madana (b) Political Party Committees 0.00 0.00 (c) Other Political Committees (such as PACs)..... 0.00 0.00 il especialistic per pillar (d) Total Contribution Refunds (add Lines 28(a), (b), and (c))............. 0.00 0.00 29. Other Disbursements (Including Non-Federal Donations)..... 0.00 30. Federal Election Activity (52 U.S.C. § 30101(20)) (a) Allocated Federal Election Activity (from Schedule H6) (i) Federal Share 0.00 0.00 (ii) "Levin" Share..... 0.00 0.00 (b) Federal Election Activity Pald Entirely With Federal Funds 0.00 0.00 (c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b)) 0.00 0.00 31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)).. 67002.00 259383.19 32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii)

67002.00

259383.19

DETAILED SUMMARY PAGE

of Disbursements

	FEC Form 3X (Rev. 05/2016)		Page 5
	III. Net Contributions/ Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
	Total Contributions (other than loans) (from Line 11(d), page 3)	52607.00 Supplementary Supplem	281432.00
	Total Contribution Refunds (from Line 28(d))	00.00 January Commission of the Commission of th	0.00
	Net Contributions (other than loans) (subtract Line 34 from Line 33)	52607.00	281432.00
36.	Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))▶	67002.00	259383.19
37.	Offsets to Operating Expenditures (from Line 15, page 3)		
38.	Net Operating Expenditures (subtract Line 37 from Line 36)	67002,00	259383.19



May 23, 2019

Mark Sly, in official capacity as Treasurer Americans Supporting Veterans PAC 8100 Ft. Smallwood Road Baltimore, MD 21226

C00658757

AF#: 3624 and 3665

Dear Mr. Sly:

On March 21, 2019, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Americans Supporting Veterans PAC and you, in your official capacity as Treasurer ("respondents"), violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 Post-General Report. The Commission also made a preliminary determination that the civil money penalty was \$3,063 based on the schedule of penalties at 11 C.F.R. § 111.43.

On April 5, 2019, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Americans Supporting Veterans PAC and you, in your official capacity as Treasurer ("respondents"), violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 Year-End Report. The Commission also made a preliminary determination that the civil money penalty was \$6,541 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination and assess a civil money penalty in both AF# 3624 and AF# 3665. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 1050 First Street, NE, Washington, DC 20463 or via facsimile (202-208-3333). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1158 if you have any questions.

Sincerely,

Rhiannon Magruder Rhiannon Magruder Reviewing Officer

Office of Administrative Review



July 2, 2019

Office of Administrative Review Feral Election Commission 1050 First Street, NE Washington, DC 20463

RE: Americans Supporting Veterans Notice3 C00658757 - AF#: 3624 and AF#3665

Rhiannon Magruder,

I am following up regarding our request an abatement of penalties that we have paid and plead our case and fees associated with Notice C00658757-AF#:364 (\$3,063) and AF#:3665 (\$6,541), as assessed in the notice sent to us on April 8, 2019 and your response sent to Mark Sly on May 23, 2019.

My team has been very focused on building a PAC that will provide value to veterans across our country; as a disabled veteran myself, this cause is very important to me. Since our inception, we have been making every effort to perform for the donors of the PAC, the recipients, political candidates and operate and file as the law required. We understand that we made a mistake in our filing process in our first year and your organization did everything they needed to do communicate with us and by providing opportunities to work with you.

However, we are further asking that you reconsider based on some information you may not have been aware of. There have been some extenuating circumstances, with regards to communication and operational challenges that have added to the predicament we find our PAC in. A very challenging example has been that for long while, we weren't getting your emails because they were being funneled into our spam folders through a paid Outlook 360 service. In fact we didn't even know there were issues with our status with the FEC until we received the hard copy that was mailed to us. This simple technical issue has come to a head and we recently rectified it; further more we will always be actively and aggressively avoiding a repeat of this in the future.

Operationally speaking, we needed to better understand the filing requirements and as a start up organization, we weren't fully aware of the intricacies of filing and staying compliant. As mentioned in our previous letter, we are now working with an attorney that is experienced with these matters and is keeping us up to speed.

8100 Ft. Smallwood Road
Baltimore MD 21226
www.americansupportingvets.org



Americans Supporting Veterans PACHonoring Our Veterans through Action

In closing, I have to say, what is most disheartening is that while we had the best intentions to do our jobs effectively, it is an issue with technology and our lack of experience that has cost veterans and those fighting for veterans almost \$9,604 in monies that could have gone to a good cause.

For all of these reasons and more, I'm humbly asking you to reconsider these penalties that we have paid and that you would waive said penalties and return the \$9,604 or a lesser amount that you feel is appropriate. My team has learned from this experience, we are working with a 3rd party vendor to provide objective support, we have improved our technology and my team is better prepared. We sincerely thank you for your time, flexibility to hear our response to your letter, and considering waiving the assessed fees.

Sincerely,

Alexander Fakeri

Americans Supporting Veterans PAC

ARF:arf
American Supporting Veterans Abatement Letter follow up
Sent to Office of Administrative Review
CC: Federal Election Commission



SENSITIVE

July 9, 2019

MEMORANDUM

To:

The Commission

Through:

Alec Palmer

Staff Director

From:

Patricia C. Orrock DC for PCO

Chief Compliance Officer

Rhiannon Magruder *PM*Reviewing Officer

Office of Administrative Review

Subject:

Final Determination Recommendation in AF# 3624 and AF# 3665 – Americans

Supporting Veterans PAC and Mark Sly, in his official capacity as Treasurer

(C00658757)

On March 21, 2019, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 Post-General Report and made a preliminary determination that the civil money penalty was \$3,063 based on the schedule of penalties at 11 C.F.R. § 111.43. On April 5, 2019, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 Year-End Report and made a preliminary determination that the civil money penalty was \$6,541 based on the schedule of penalties at 11 C.F.R. § 111.43.

On April 29, 2019, the Commission received their written response ("challenge"). After reviewing the challenge, the Reviewing Officer Recommendation ("ROR") dated May 23, 2019 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission make a final determination in AF# 3624 and AF# 3665.

Within 10 days of transmittal of the recommendation, the respondents may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f). On July 2, 2019, the respondents submitted a response requesting that the Commission reconsider the penalties.

The respondents state that the Committee has made every effort to comply and acknowledge their inexperience. The respondents further explain that they did not receive Commission emails because they were automatically filtered into spam folders. The Committee has since resolved this issue. In addition, the Committee is now working with an experienced

attorney and third-party vendor to help with filings and compliance. The Committee has learned from this experience and is now better prepared.

As stated in the ROR, failure to know filing dates and inexperience of a Treasurer or committee staff are included at 11 C.F.R. § 111.35(d) as examples of a circumstance that will not be considered reasonably unforeseen and beyond the respondents' control. Therefore, the Reviewing Officer recommends that the Commission make a final determination in AF# 3624 and AF# 3665 that the respondents violated 52 U.S.C. § 30104(a) and assess civil money penalties of \$3,063 in AF# 3624 and \$6,541 in AF# 3665.

OAR Recommendations

- 1. Adopt the Reviewing Officer recommendation for AF# 3624 involving Americans Supporting Veterans PAC and Mark Sly, in his official capacity as Treasurer, in making the final determination;
- 2. Make a final determination in AF# 3624 that Americans Supporting Veterans PAC and Mark Sly, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$3,063 civil money penalty;
- 3. Adopt the Reviewing Officer recommendation for AF# 3665 involving Americans Supporting Veterans PAC and Mark Sly, in his official capacity as Treasurer, in making the final determination;
- 4. Make a final determination in AF# 3665 that Americans Supporting Veterans PAC and Mark Sly, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$6,541 civil money penalty; and
- 5. Send the appropriate letter.

19092724146

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	AFs 3624 and 3665
Final Determination Recommendation:)	
Americans Supporting Veterans PAC,)	
and Mark Sly, in his official capacity as)	
Treasurer (C00658757)	Ś	

CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on August 05, 2019, the Commission decided by a vote of 4-0 to take the following actions in AFs 3624 and 3665:

- 1. Adopt the Reviewing Officer recommendation for AF# 3624 involving Americans Supporting Veterans PAC and Mark Sly, in his official capacity as Treasurer, in making the final determination.
- 2. Make a final determination in AF# 3624 that Americans Supporting Veterans PAC and Mark Sly, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$3,063 civil money penalty.
- 3. Adopt the Reviewing Officer recommendation for AF# 3665 involving Americans Supporting Veterans PAC and Mark Sly, in his official capacity as Treasurer, in making the final determination.
- 4. Make a final determination in AF# 3665 that Americans Supporting Veterans PAC and Mark Sly, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$6,541 civil money penalty.
- 5. Send the appropriate letter.

Federal Election Commission AF# 3624 and AF# 3665 August 05, 2019

Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

.8/5/19

Laura E. Sinram

Acting Secretary and Clerk of the

Commission

Attest:

August 6, 2019

Mark Sly, in official capacity as Treasurer Americans Supporting Veterans PAC 8100 Ft. Smallwood Road Baltimore, MD 21226

C00658757 AF#: 3624

Dear Mr. Sly:

On March 21, 2019, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Americans Supporting Veterans PAC and you, in your official capacity as Treasurer ("respondents"), violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 Post-General Report. By letter dated March 21, 2019, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$3,063 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On April 29, 2019, the Office of Administrative Review received your written response challenging the RTB finding.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and your written response. Based on this review, the Reviewing Officer recommended that the Commission make a final determination that Americans Supporting Veterans PAC and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and assess a civil money penalty in the amount of \$3,063 in accordance with 11 C.F.R. § 111.43. The Reviewing Officer Recommendation was sent to you on May 23, 2019.

On August 5, 2019, the Commission adopted the Reviewing Officer's recommendation and made a final determination that Americans Supporting Veterans PAC and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and assessed a civil money penalty in the amount of \$3,063. A copy of the Final Determination Recommendation is attached.

On May 21, 2019, the Commission received your payment of \$3,063.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 C.F.R. §§ 111.42(b) and 111.20(c), the file will be placed on the public record within 30 days from the date of this notification.

If you have any questions regarding the payment of the civil money penalty, please contact Rhiannon Magruder on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,

Ellen L. Weintrand

Ellen L. Weintraub

Chair

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 3424